

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	§	
	§	
Wireless E911 Location Accuracy	§	PS Docket No. 07-114
Requirements	§	

REPLY COMMENTS OF NENA: THE 9-1-1 ASSOCIATION

NENA: The 9-1-1 Association¹ hereby submits the following reply comments in response to the Public Notice (“Notice”)² in the above-captioned proceeding. In these reply comments, NENA reiterates its stance that CTIA’s z-axis accuracy recommendation of ± 5 meters is not sufficiently precise for public safety and that floor-level accuracy (± 3 meters) is both necessary for public safety and feasible based on the Test Bed’s results. NENA also recognizes the nationwide carriers’ concerns regarding the broad applicability of the z-axis location technologies in question, but stresses that any testing time extension granted by the Commission should be both modest and strictly enforced. Finally, NENA wishes to clarify in these comments that the division of “dispatchable location” into two levels is a useful technical distinction that should continue to exist, but that this distinction must not be used to dilute or skirt in any way the Commission’s definition of “dispatchable location.”

I. CTIA’s z-axis recommendation of ± 5 meters is not sufficiently precise for public safety.

¹ NENA: The 9-1-1 Association improves 9-1-1 through research, standards, development, training, education, outreach, and advocacy. Our vision is a public made safety and more secure through universally-available, state-of-the-art 9-1-1 systems and trained 9-1-1 professionals. NENA is the only professional organization solely focused on 9-1-1 policy, technology, operations, and education issues.

² See Public Safety and Homeland Security Bureau Seeks Comment on Vertical (Z-Axis) Accuracy Metric Proposed by the Nationwide Wireless Carriers, PS Docket No. 07-114, September 10, 2018, <https://ecfsapi.fcc.gov/file/0910993124543/DA-18-928A1.pdf>

NENA stated unequivocally in its initial Comments that ± 5 -meter recommendation made by the nationwide wireless carriers is neither acceptable for public safety nor supported by the Test Bed's Stage Z Report.³ NENA's sentiments echo those of numerous other public safety organizations in the record, including APCO, the Texas 9-1-1 Entities, and NPSTC.⁴ It should be clear from these comments that public safety cannot accept anything less precise than ± 3 meters accuracy in the z-axis. Further, as noted by IACP, IAFC, NASEMSO, and NSA in their joint comment, the provision of floor-level z-axis estimates has already been promised by AT&T to FirstNet subscribers — nearly two years prior to the Commission's deadline for a commercial z-axis accuracy requirement.⁵ Floor-level accuracy is crucial for both field responders and those they seek to aid in an emergency — anything less will cost lives.

II. If the Commission agrees that additional testing is required before the z-axis accuracies achieved in the Test Bed to date can be safely mandated for the top 25 Cellular Market Areas (CMAs) in 2021, any time extension granted for this testing should be modest in length and strict in enforcement.

NENA recognizes that Test Bed LLC was not, for various reasons, able to complete testing on NextNav's Metropolitan Beacon System (MBS) z-axis solution in all three of its locations, and that because of this, CTIA has expressed concerns regarding NextNav's performance in "extreme weather conditions."⁶ Should the Commission find merit in these concerns and grant

³ See Comments of NENA: The 9-1-1 Association, PS Docket No. 07-114, October 4, 2018.

⁴ See Comments of the National Public Safety Telecommunications Council (NPSTC), PS Docket No. 07-114, filed October 1, 2018, <https://www.fcc.gov/ecfs/filing/1001141208880>; Comments of APCO International, PS Docket No. 07-114, October 1, 2018, <https://www.fcc.gov/ecfs/filing/1001845910043>; Comments of the International Association of Firefighters, PS Docket No. 07-114, filed October 3, 2018, <https://www.fcc.gov/ecfs/filing/100243859562>.

⁵ Comments of the International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), the National Association of State Emergency Medical Services Officials (NASEMSO), and the National Sheriffs' Association (NSA), PS Docket No. 07-114, filed October 1, 2018, <https://www.fcc.gov/ecfs/filing/100104030060>.

⁶ See Ex Parte of CTIA re: Wireless E-9-1-1 Location Accuracy Requirements, PS Docket No. 07-114, Submission of Z-axis Metric and Report, August 3, 2018 (hereinafter "CTIA Z-Axis Cover Letter"). *But See* Comments of NextNav, PS Docket 07-114, filed October 1, 2018 at 9, ("the test results for Polaris' indoor location technology in Chicago were consistent with—if not slightly better than—Polaris' test results for San Francisco.").

CTIA's request for additional time to complete testing in Chicago, NENA implores the Commission to set a firm, fast, and fair deadline for these tests — even if this means the test bed must manage its schedule so the industry can meet the Commission's long-established deadlines for implementation of the z-axis metrics.⁷ The Commission's deadlines to date have been both generous and well-known, and it is largely because of these deadlines that 9-1-1 has solutions available today capable of such impressive accuracy. Public safety — and the public it serves — should not have to wait a single day longer than necessary for accurate z-axis location solutions to be tested and deployed.

III. The distinction between “WDL1” and “WDL2” has no bearing on the definition of — or public safety's ongoing need for — true dispatchable location.

The Texas 9-1-1 Entities note NPSTC's contention that the use of “WDL1” and “WDL2” per the ATIS standard may create confusion regarding the meaning of “dispatchable location.”⁸ We agree with The Texas 9-1-1 Entities that this distinction is potentially useful for cases where true dispatchable location⁹ is infeasible, but emphasize that this distinction should by no means be used to skirt public safety's ultimate goal of true dispatchable location. As APCO states in its comments, dispatchable location always be the gold standard for indoor location accuracy.¹⁰

IV. Closing

⁷ It should be noted that NextNav was unable to deploy its network during the original round of testing because it was notified of Chicago's selection as a test site only months before testing was scheduled to occur. NENA's request for timely additional testing comes with the condition that NextNav be given appropriate opportunity to deploy its network in Chicago. *See* Comments of NextNav, PS Docket No. 07-114, filed October 1, 2018, <https://www.fcc.gov/ecfs/filing/100221441568>.

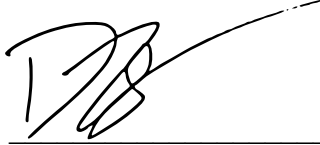
⁸ *See* Comments of the Texas 9-1-1 Entities at 5–6.

⁹ The Commission's Fourth Report and Order, ¶ 44 defines “dispatchable location” as “the verified or corroborated street address of the calling party plus additional information such as floor, suite, apartment or similar information that may be needed to adequately identify the location of the calling party.”

¹⁰ Comments of the Association of Public Safety Communications Officials-International (APCO), PS Docket No. 07-114, filed October 1, 2018 at 2.

NENA appreciates the opportunity to submit comments in response to this proceeding, and invites any questions or comments from the Commission.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'DH' with a long, sweeping horizontal line extending to the right.

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